

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA  
(Philadelphia)**

MICHELE M. BURNS

Plaintiff,

v.

FORD MOTOR CREDIT COMPANY,  
LLC, TRANS UNION, LLC, EQUIFAX  
INFORMATION SERVICES, LLC and  
MICHAEL J. BURNS

Defendants.

Civil Action No. 2:19-cv-01647-RBS

**NOTICE OF MOTION *IN LIMINE***

TO: Mark A. DiAntonio, Esquire  
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PLEASE TAKE NOTICE that Defendant Ford Motor Credit Company LLC will move this Court, before the Honorable R. Barclay Surrick, Senior United States District Judge, at the United States District Court for the Eastern District of Pennsylvania, James A. Bryne U.S. Courthouse 601 Market Street, Room 8614, Philadelphia, Pennsylvania 19106, on a date and time to be determined by the Court, for an Order, pursuant to Federal Rules of Evidence 702, 401 and 403, precluding plaintiff from offering any testimony, references to testimony or argument based upon the testimony or opinions of Dr. David Nadler (“Dr. Nadler”) and precluding the entry of Dr. Nadler’s expert report.

In support of this motion, Defendants rely upon the accompanying memorandum of law and all of the pleadings, records and papers filed herein.

Dated: September 8, 2021

**WONG FLEMING**

By: /s/ Dafney Dubuisson Stokes

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